

Chief District Judge Ricardo S. Martinez

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

FATIMA MOUJTAHID, on behalf of  
herself and her minor child B.M.,  
Plaintiffs,

v.

UNITED STATES CITIZENSHIP &  
IMMIGRATION SERVICES, *et al.*,  
Defendants.

CASE NO. C18-01789-RSM

**JOINT STATUS REPORT AND  
ORDER**

Plaintiff filed the above-captioned lawsuit under the Freedom of Information Act (“FOIA”) against Defendants seeking disclosure of certain documents. Pursuant to the Court’s August 13, 2019 order, Dkt. No. 29, the parties submit this joint status report and, for good cause shown below, respectfully request that the Court allow them to continue to work towards resolution of this matter without further judicial intervention and submit a joint status report within the next 60 days.

As the Court is aware, this FOIA litigation relates to an underlying state court litigation in which Plaintiff’s counsel is involved. Since the last update to the Court, Plaintiff’s counsel has continued to attempt to obtain releases from third parties in that litigation that may allow Defendant United States Citizenship & Immigration Services (“USCIS”) to produce additional potentially responsive records to Plaintiff. However, Plaintiff’s counsel has been unsuccessful thus far despite the third parties’ representations

1 otherwise. Without those authorizations, USCIS's position is that it cannot produce the  
2 information that Plaintiff seeks.

3 Plaintiff's counsel states that upcoming motion practice in the state court litigation  
4 may allow for a complete resolution of this FOIA litigation. Both parties agree that good  
5 cause exists to allow time for the underlying litigation's motion practice to potentially  
6 resolve the issues in this case, while at the same time the parties work together to  
7 continue to resolve any outstanding issues possibly not addressed in the underlying  
8 litigation. The parties propose a joint status report to be filed on or before November 25,  
9 2019.

10 DATED this 26th day of September, 2019.

11  
12 Respectfully Submitted,

13 BRIAN T. MORAN  
14 United States Attorney

15 s/ Michelle R. Lambert  
16 MICHELLE R. LAMBERT, NYS #4666657  
17 Assistant United States Attorney  
18 United States Attorney's Office  
19 1201 Pacific Ave, Suite 700  
20 Tacoma, Washington 98402  
21 Phone: (253) 428-3824  
22 Email: [michelle.lambert@usdoj.gov](mailto:michelle.lambert@usdoj.gov)

23 *Attorneys for Defendants*

24 s/ Jay Gairson  
25 JAY GAIRSON, WSBA # 43365  
26 Gairson Law, LLC  
27 4606 MLK Jr Wy S  
28 Seattle, WA 98108  
Phone: 206-357-4218  
Email: [jay@gairson.com](mailto:jay@gairson.com)

*Attorney for Plaintiffs*

**ORDER**

It is hereby ORDERED that:

For good cause shown, the parties shall file a joint status report on or before November 25, 2019.

Dated this 30 day of September, 2019.



RICARDO S. MARTINEZ  
CHIEF UNITED STATES DISTRICT JUDGE